

EXHIBIT E

From: Esser, Will
To: [Massey, David B](#); beth.moon@hoganlovells.com; marty.steinberg@hoganlovells.com; daniela.carreras@hoganlovells.com; pieter.vantol@hoganlovells.com
Cc: [Christian Dribusch](#); [Justin Heller](#); [Matthew Zapala](#); lisa.penpraze@usdoj.gov; [McMahon, Michelle](#); [Traison, Michael](#)
Subject: RE: Conflict of Hogan Lovells in Prime Capital Ventures, LLC bankruptcy case - PROMPT RESPONSE REQUESTED
Attachments: [Camshaft v. Prime Capital Ventures - Involuntary Bankruptcy filed against Prime.msg](#)

Counsel,

I did not hear back with regard to addressing this conflict. In addition to the details laid out below, I also wanted to point out that I notified Dave Massey regarding the bankruptcy filing at 2:34 p.m. on 12/19 (see attached email), and then Camshaft's motion for entry of final judgment was filed by Dave Massey at 6:49 p.m., some 4 hours after receiving notice of the bankruptcy. If Hogan attempts to appear at the hearing on behalf of Prime, this conflict situation will have to be addressed first thing.

Will

From: Esser, Will
Sent: Saturday, December 30, 2023 6:21 PM
To: Massey, David B <david.massey@hoganlovells.com>; beth.moon@hoganlovells.com; marty.steinberg@hoganlovells.com; daniela.carreras@hoganlovells.com; pieter.vantol@hoganlovells.com
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Subject: Conflict of Hogan Lovells in Prime Capital Ventures, LLC bankruptcy case - PROMPT RESPONSE REQUESTED

Counselors at Hogan Lovells,

I am in receipt of the substitution of counsel which was filed today which purports to substitute Pieter Van Tol of Hogan Lovells US LLP as counsel of record for Prime Capital Ventures, LLC in its involuntary bankruptcy case filed in the Bankr. NDNY (copy attached). I thought it essential to immediately bring to everybody's attention that this appears to be a direct conflict of interest. Hogan Lovells represents CamShaft LLC in its lawsuit against Prime Capital Ventures, LLC in Miami-Dade state court. Indeed, on December 19, 2023 (the very day that the involuntary bankruptcy petition was filed), Hogan Lovells filed the attached motion for entry of final judgment against Prime Capital Ventures in the Miami-Dade litigation. I checked the docket and that lawsuit remains open and pending. Indeed, Camshaft's complaint (filed by Hogan Lovells) is attached as Exhibit Q to the Emergency Motion to Appoint Interim Trustee in the Prime bankruptcy.

I have to believe that this was an oversight in Hogan's conflicts system. Please discuss this matter amongst yourselves immediately given the pending hearing set by the Bankruptcy Court for 10:00 a.m. on January 2. I see no way that Hogan attorneys can represent Prime Capital Ventures, LLC in the bankruptcy when they are simultaneously directly adverse to Prime in the Miami-Dade lawsuit,

and where this direct adversity existed on the date the bankruptcy case was filed and continues to remain to this day. I look forward to hearing from you as to how you intend to proceed.

Michelle and Michael, you may also wish to consult with Hogan on this, as I think their conflict affects the validity of your substitution out as counsel.

Regards,

Will Esser

Counsel for Petitioning Creditor Compass-Charlotte.